

EXHIBIT A

PARTIES' PROPOSED CONSTRUCTIONS AND IDENTIFICATION OF EVIDENCE

A. U.S. Patent No. 7,293,291

Claim Term	Claim(s)	CDN's Proposed Constructions and Evidence	Grande's Proposed Constructions and Evidence
"blocking logic"	1, 2, 9, 22, 24, 25	<p><i>Proposed Construction:</i></p> <p>No construction needed.</p>	<p><i>Proposed Construction:</i></p> <p>112(6) governs this term.</p> <p>The claimed function: selectively disabling communications in response to a signal from detection logic.</p> <p>The corresponding structure: not disclosed. Therefore, the term is indefinite.</p> <p>To the extent the term is found not to be a 112(6) term, Grande proposes the following definition:</p> <p>Functionality operating on physical circuitry that is separate from the main processor and control logic of the router and that is not integrated with other functions of the router, configured to transmit a signal that prevents the transmission of data through its assigned Ethernet port by opening a physical switch upon receiving a signal from the detection logic.</p>
"detection logic" or "detecting logic"	1, 2, 9, 22, 24, 25	<p><i>Proposed Construction:</i></p> <p>Regarding "detection logic", no construction needed.</p> <p>Regarding "detecting logic," it is Plaintiff's position that this claim term includes a typographical error</p>	<p><i>Proposed Construction:</i></p> <p>112(6) governs this term.</p> <p>The claimed function: detecting user inactivity at the end-user computer.</p> <p>The corresponding structure: not disclosed. Therefore, the term</p>

		within the patent. Plaintiff maintains that the term should instead recite and be construed as “detection logic”. Beyond this typographical correction, Plaintiff believes no construction is needed.	is indefinite. To the extent the term is found not to be a 112(6) term, Grande proposes the following definition: Functionality operating on physical circuitry that is separate from the main processor and control logic of the router and that is not integrated with other functions of the router, configured to automatically determine an inactivity event from an end-user computer and provide a signal to the blocking logic.
“embedded”	1, 9, 22, 24, 25	<i>Proposed Construction:</i> No construction needed.	<i>Proposed Construction:</i> Physically associated only with, and capable of operating only with, a single assigned Ethernet port.
“auto-sensing”	1, 9, 22, 25	<i>Proposed Construction:</i> No construction needed.	<i>Proposed Construction:</i> Indefinite.
“Ethernet port”	1, 9, 22, 25	<i>Proposed Construction:</i> No construction needed.	<i>Proposed Construction:</i> The collection of all physical hardware that relates exclusively to the operation of a single Ethernet port on a router.
“the idle time activity threshold”	16	<i>Proposed Construction:</i> It is Plaintiff’s position that this claim term includes a typographical error within the patent. Plaintiff maintains that the term should instead recite and be construed as “the idle time inactivity threshold”. Beyond this typographical correction, Plaintiff	<i>Proposed Construction:</i> Indefinite for lack of antecedent basis.

		believes no construction is needed.	
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B. U.S. Patent No. 7,565,699

Claim Term	Claim(s)	CDN's Proposed Constructions and Evidence	Grande's Proposed Constructions and Evidence
"blocking logic"	1, 5, 6	<p><i>Proposed Construction:</i></p> <p>No construction needed.</p>	<p><i>Proposed Construction:</i></p> <p>112(6) governs this term.</p> <p>The claimed function: selectively disabling communications in response to a signal from detection logic.</p> <p>The corresponding structure: not disclosed. Therefore, the term is indefinite.</p> <p>To the extent the term is found not to be a 112(6) term, Grande proposes the following definition:</p> <p>Functionality operating on physical circuitry that is separate from the main processor and control logic of the router and that is not integrated with other functions of the router, configured to transmit a signal that prevents the transmission of data through its assigned Ethernet port by opening a physical switch upon receiving a signal from the detection logic.</p>
"detection logic"	1, 7	<p><i>Proposed Construction:</i></p> <p>No construction needed.</p>	<p><i>Proposed Construction:</i></p> <p>112(6) governs this term.</p> <p>The claimed function: detecting user inactivity at the end-user computer.</p>

			<p>The corresponding structure: not disclosed. Therefore, the term is indefinite.</p> <p>To the extent the term is found not to be a 112(6) term, Grande proposes the following definition:</p> <p>Functionality operating on physical circuitry that is separate from the main processor and control logic of the router and that is not integrated with other functions of the router, configured to automatically determine an inactivity event from an end-user computer and provide a signal to the blocking logic.</p>
“embedded”	1, 9	<p><i>Proposed Construction:</i></p> <p>No construction needed.</p>	<p><i>Proposed Construction:</i></p> <p>Physically associated only with, and capable of operating only with, a single assigned Ethernet port.</p>
“auto-sensing”	2, 10	<p><i>Proposed Construction:</i></p> <p>No construction needed.</p>	<p><i>Proposed Construction:</i></p> <p>Indefinite.</p>
“Ethernet port”	3, 11	<p><i>Proposed Construction:</i></p> <p>No construction needed.</p>	<p><i>Proposed Construction:</i></p> <p>The collection of all physical hardware that relates exclusively to the operation of a single Ethernet port on a router.</p>
“the blocking logic is further adapted to allow communications to be sent over	6	<p><i>Proposed Construction:</i></p> <p>No construction needed.</p>	<p><i>Proposed Construction:</i></p> <p>The term is indefinite for lack written description support and/or lack of enablement.</p>

the first interface to at least one other end-user computer in the local area network”			
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C. U.S. Patent No. 6,865,532

Claim Term	Claim(s)	CDN's Proposed Constructions and Evidence	Grande's Proposed Constructions and Evidence
"associated user"	2	<i>Proposed Construction:</i> No construction needed.	<i>Proposed Construction:</i> The preamble is limiting.
"common storage"	2	<i>Proposed Construction:</i> No construction needed.	<i>Proposed Construction:</i> A server-based storage system.
"verifying the unique identifiers using a common storage device"	2	<i>Proposed Construction:</i> No construction needed.	<i>Proposed Construction:</i> Using common storage to verify that a submitted unique identifier has not already been assigned to another physical device.
"unique identifier"	1, 7	<i>Proposed Construction:</i> No construction needed.	<i>Proposed Construction:</i> A unique phrase, consisting of a predetermined number of words, with each word chosen from a predetermined list of words, that is associated with a single physical device such as a radio or cell phone.
"generating a plurality of unique identifiers by selecting one word from each set for each word"	1	<i>Proposed Construction:</i> No construction needed.	<i>Proposed Construction:</i> Storing in memory two or more unique identifiers, where each unique identifier consists of a selection of one predetermined word from each predetermined word slot.

slot for each identifier such that a concatenating of the selected words in the predetermined order form the unique identifier”			
“recognizing a particular unique identifier with a speech recognizer”	7	<i>Proposed Construction:</i> No construction needed.	<i>Proposed Construction:</i> Indefinite.

D. U.S. Patent No. 7,164,714

Claim Term	Claim(s)	CDN's Proposed Constructions and Evidence	Grande's Proposed Constructions and Evidence
"mosaic"	17	<i>Proposed Construction:</i> No construction needed.	<i>Proposed Construction:</i> A juxtaposition of sub-sampled active video signals displayed in a single image plane.
"a descriptor corresponding to each secondary signal characterizing the corresponding primary video signal"	12	<i>Proposed Construction:</i> No construction needed.	<i>Proposed Construction:</i> A descriptor is information multiplexed into the digital signal and describes the content of the digital signal.
"multiplexing the plurality of coded video signals with the plurality of coded sub-sampled video signals associated with their additional data to provide an output video signal"	13	<i>Proposed Construction:</i> No construction needed.	<i>Proposed Construction:</i> The term "additional data" is in reference to the descriptor.

E. U.S. Patent No. 6,628,344

Claim Term	Claim	CDN's Proposed Constructions and Evidence	Grande's Proposed Constructions and Evidence
"a wireless signal concurrently encoded with the user selected command and the preset command"	1	<i>Proposed Construction:</i> No construction needed.	<i>Proposed Construction:</i> A single infrared beam having two sub-parts, where a first sub-part is the user command recognized by a first remote apparatus and the second sub-part is the present command recognized by a second remote apparatus.
"the preset command signal"	1	<i>Proposed Construction:</i> No construction needed.	<i>Proposed Construction:</i> A channel selection logically associated with the user selected command and which is necessary to set or reset a configuration on the second remote device in order to form a communication link with the first remote device.
"interlinking an intercoupling signal"	1	<i>Proposed Construction:</i> No construction needed.	<i>Proposed Construction:</i> Establishing a video transmission pathway between a source device and a TV.
"establish a necessitous setting of the second remote apparatus to"	1	<i>Proposed Construction:</i> No construction needed.	<i>Proposed Construction:</i> Tuning the TV to a channel that is based on a user command and is necessary to set or reset a configuration on the second remote apparatus in order to form a communication link with the first remote apparatus.

“the user selected command signal submitted to the first remote apparatus is ordinarily accompanied by the preset command signal”	1	<p><i>Proposed Construction:</i></p> <p>No construction needed.</p>	<p><i>Proposed Construction:</i></p> <p>Indefinite.</p> <p>Alternatively - the user selected command signal is always accompanied by the preset command signal.</p>
“the remote apparatus”	1	<p><i>Proposed Construction:</i></p> <p>No construction needed.</p>	<p><i>Proposed Construction:</i></p> <p>Indefinite - the term lacks antecedent basis.</p>
“automatically establish an affirmation that the second remote apparatus is necessarily set to accept the intercoupling signal”	1	<p><i>Proposed Construction:</i></p> <p>No construction needed.</p>	<p><i>Proposed Construction:</i></p> <p>Always automatically sending the preset command signal with a user selected command to set or reset a configuration on the second remote apparatus in order to form or affirm a communication link with the first remote apparatus.</p>

F. U.S. Patent No. 6,311,180

Claim Term	Claim(s)	CDN's Proposed Constructions and Evidence	Grande's Proposed Constructions and Evidence
"providing one or more source contents in a predetermined format"	1	<i>Proposed Construction:</i> No construction needed.	<i>Proposed Construction:</i> Making available one or more documents or applications, which contain formatting information, prior to display limitations and viewing preferences being used to modify that formatting information to generate the display content.
"recognizing the display limitations of the display device from a first information source"	1	<i>Proposed Construction:</i> No construction needed.	<i>Proposed Construction:</i> The "first information source" is different than the "second information source".
"determining the viewing preferences of the user from a second information source"	1	<i>Proposed Construction:</i> No construction needed.	<i>Proposed Construction:</i> The "first information source" is different than the "second information source".
"selecting one or more preferred display contents from the source contents by a mapping system "	1	<i>Proposed Construction:</i> No construction needed.	<i>Proposed Construction:</i> 112(6) governs this term ("mapping system"). The claimed function: reading viewing preferences and display

in conformance with the display limitations and the viewing preferences”			<p>limitations to generate a display document.</p> <p>The corresponding structure: One or more computer servers consisting of an application description file, database, e-commerce server, application server and ISP web server (as depicted in Figure 3) that are configured to perform a localization process (Col 6 lines 45-63), a prioritization process (Col 7 line 3 – Col 8 line 63), a selection process (Col 8 line 64 – Col 9 line 27) and an organization process (Col 9 line 28 – Col 10 line 11) to develop a display document.</p>
“viewing preferences”	1, 5, 6	<p><i>Proposed Construction:</i></p> <p>No construction needed.</p>	<p><i>Proposed Construction:</i></p> <p>A set of configurations that are set by the user on the display device and control at least one aspect of how the source content is to be visually presented on the display device.</p>